

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

)	In Proceedings for a
)	Reorganization under
)	Chapter 11
In Re:)	
)	
)	Jointly Administered Under
W. R. GRACE & CO., et al)	Case No. 01-01139-JKF
)	
)	
Debtor.)	
)	
)	

FEDERAL RULE OF BANKRUPTCY
PROCEDURE VERIFIED 2019 STATEMENT
REPRESENTATION BY

McPHERSON, MONK, HUGHES, BRADLEY, WIMBERLEY & STEELE, L.L.P.

Exhibits have not been scanned into the docket but are available from the Clerk through
Parcels, Inc., 1-800-343-1742

I, James E. Wimberley, a representative of McPherson, Monk, Hughes, Bradley,
Wimberley & Steele, L.L.P. declare as follows:

1. I am a shareholder with the law firm of McPherson, Monk, Hughes, Bradley, Wimberley & Steele, L.L.P. (hereinafter the "Firm"). I am a member in good standing of the bar of the State of Texas.
2. I am involved in the Firm's representation of personal injury claimants and based upon that representation and the review of business records of the Firm. I have personal knowledge of the facts set forth herein. I make this statement (the "Statement") pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure and pursuant to the terms of Judge Fitzgerald's October 22, 2004 Order of Court.
3. The Firm, a Limited Liability Partnership, is organized under the laws of Texas with its principal offices for the practice of law located at 3120 Central Mall Drive, Port Arthur, Texas 77642.

4. As of the date of this Statement, the Firm represents a number of personal injury claimants (the "Claimants" or individually, a "Claimant") who have been injured by asbestos or asbestos-containing products manufactured, marketed, distributed, sold, installed, or produced by the above-referenced debtors and debtors-in-possession (the "Debtors") and others, and thus hold claims against, *inter alia*, the Debtors. Attached, as Exhibit "A-1", the Firm's MASTER INDEX, is a list of the Claimants represented by the Firm.

5. Each of these Claimants has employed the Firm under an employment contract with the Firm or with referring counsel. In the vast majority of instances these contracts include a power of attorney/ fee agreement, and in those instances where that is not the case, nearly all Claimants have executed a separate power of attorney. In all cases, however, the Firm is authorized by law to act on the Claimant's behalf. For reference, and pursuant to Judge Fitzgerald's Order, a blank, but unredacted, exemplar, of each form of agreement or instrument, whereby, McPherson, Monk, Hughes, Bradley, Wimberley & Steele, L.L.P. is empowered to act on behalf of each Claimant is attached hereto as Exhibit "A".

6. Individually prepared as Exhibits for each Claimant , the name and address for each Claimant represented by the Firm is found on Exhibit "B", subpart "1" attached hereto. The last four digits of the Social Security Number of each of the Claimants is found on attached "Exhibit "B", subpart "2". The nature and amount of the claim or interest and the time of acquisition thereof or an allegation that the claim or interest was acquired more than one year prepetition is found on Exhibit "B, subpart 3" attached hereto. Exhibit "B", subparts "4" and "5" are not applicable to any of the Claimants represented by the Firm. A description of how counsel became involved with the claimant is found on Exhibit "B", subpart "6". A copy of the fee agreement between counsel and the Claimants is attached as Exhibit "B", subpart "7".

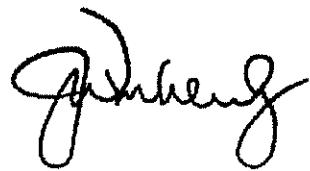
7. As previously set forth in paragraph 4 above, the nature if the claim held by each Claimant is a personal injury tort claim for damages caused by asbestos or asbestos-containing products manufactured, marketed, distributed, sold, installed or produced by the Debtors and others.

8. Each Claimant is represented by the Firm under a fee agreement as referenced in paragraph 6 above. The Firm holds each such instrument.

9. The filing of the Firm's Statement does not waive any rights including (i) The Claimants' rights to have final orders in non-core matters entered only after *de novo* review by a district judge; (ii) the Claimants' rights to trial by jury in any proceeding and any trial on their claims; (iii) the Claimants' rights to have reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal or abstention to the extent not previously directed; (iv) the Claimants' right in not submitting themselves to the jurisdiction of the Bankruptcy Court; or (v) any other rights, claims, actions, defenses, reclamations, setoffs or recoupments to which the Claimant are or may be entitled under any agreements, in law or in equity, all of which rights, claims, actions, defenses, reclamations, setoffs, and recoupments the Firm's Claimants expressly reserve.

I declare under penalty or perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 26th day of January, 2005 at Port Arthur, Texas.



James E. Wimberley

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